REMARKS

Claims 1-25 are pending in the application. Claims 1-25 were rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,246,981 to Papineni et al. ("Papineni") in view of U.S. Patent No. 5,748,841 to Morin et al. ("Morin").

In the Response to Arguments set forth on page 3 of the Final Office Action, Applicants understand that non-obviousness can not generally be shown by attacking references individually where the rejections are based on a combination of references. However, to establish a prima facie case of obviousness, the combination of the prior art references must teach or suggest all the claim limitations of the rejected claims (see, e.g., MPEP 2141, 2143, 2143.03). Therefore, it is clear that if an Examiner relies on a particular reference as disclosing one or more specific elements of the rejected claim, that particular reference *can* be attacked individually by showing that the reference does not disclose the specific elements as contended by the Examiner. Accordingly, if at least one of the references in a cited combination of references does not disclose or teach elements of the rejected claim as cited by an Examiner, then it logically and legally follows that such combination would fail to establish a prima facie case of obviousness against such claim.

Here, it is respectfully submitted that the combination of Papineni and Morin is legally deficient to establish a prima facie case of obviousness under 35 U.S.C. 103 to support the rejection of claims 1, 10 and 19 because Papineni and Morin (either singularly or their combination) do not teach or suggest all of the claim elements of claims 1, 10 and 19.

-2-

In particular, with respect to claims 1 and 10, the combination of Papineni and Morin is legally deficient to establish obviousness because Papineni and Morin, either singularly or in combination, do <u>not</u> teach or suggest *a dialog manager that receives commands associated with an unknown application and then executes a method associated with the application*, as essentially claimed in claims 1 and 10. In other words, <u>the application associated with the user command is unknown to the dialog manager, but the dialog manager determines the target application by determining the current context via a history of events.</u>

Papineni discloses a method for dialog management in a conversational system. The dialog manager of Papineni interacts with a single <u>known</u> active application. Papineni discloses a "task-oriented" system which manages a plurality of tasks for <u>a particular application-specific domain</u> (see, e.g., Papineni, col. 1, lines 12-14; col. 5, lines 63-64; and Fig. 1 (Application-specific backend 60)). Indeed, Papineni discloses that the behavior of the dialog manager is described in a "script" which includes the specification of all forms in the given <u>application-specific domain</u>, wherein each form corresponds to a task in the <u>application-specific domain</u> (col. 6, lines 51-60).

Although Papineni discloses that the dialog manager is "application blind" (as pointed to by Examiner in col. 6, line 44 - Col. 7, line5), Papineni clearly explains that the term "application blind" means that (i) the same dialog manager can be used to build different applications, wherein the interaction between the dialog manager and the backend is specified in the script; and that (ii) the programming logic of the dialog manager is <u>separate</u> from the backend logic (col.

-3-

7, lines 6-11). In other words, although the dialog manager can be used for different applications, <u>Papineni does not disclose a dialog manager that can process a command to execute a method associated with an unknown application, as essentially claimed in claims 1 and 10.</u>

Examiner does not rely on Morin for disclosing *dialog manager that receives commands associated with an unknown application and then executes a method associated with the application.* Thus, the combination of Papineni and Morin legally deficient to establish a prima facie case of obviousness against claims 1 and 10.

Further, because both Papineni and Morin are directed to methods for <u>application-specific dialog management</u>, neither reference nor the combination of such references, would provide motivation or suggestion to one of ordinary skill in the art system to develop a method for dialog management where the target application of the command is unknown by the dialog manager, as essentially claimed in claims 1 and 10. Accordingly, for at least the above reasons, claims 1 and 10 are believed to be nonobvious and patentable over the combination of Papineni and Morin.

Further, with respect to claim 19, the combination of Papineni and Morin is legally deficient to establish obviousness because at the very minimum, Papineni and Morin, either singularly or in combination, do <u>not</u> disclose or suggest a dialog management system that applies methods responsive to the command received by a dialog manager *for an appropriate application.* Indeed, as explained above, both Papineni and Morin are directed to application-

-4-

specific dialog management systems (only one application) and, consequently, such systems do not have to determine or apply methods responsive to commands for an <u>appropriate application.</u> Thus, claim 19 is patentably and nonobvious over the combination of Papineni and Morin.

Claims 2-9 depend from claim 1, claims 11-18 depend from claim 10 and claims 20-25 depend from claim 19. As such, these claims are believed to be nonobvious and patentable over the combination of Papineni and Morin at least for the reasons given above for respective base claims 1, 10 and 19.

Accordingly, the withdrawal of all the rejections under 35 U.S.C. §103(a) is respectfully requested.

Early and favorable consideration by the Examiner is respectfully urged. Should the Examiner believe that a telephone or personal interview may facilitate resolution of any remaining matters, it is requested that the Examiner contact Applicants' undersigned attorney.

Respectfully submitted,

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